

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1-3 and 5-7 are pending. Claims 1 and 5, which are independent, are hereby amended. Support for this amendment is provided throughout the Specification and Drawings, specifically at pages 3-4 and Figures 4-5. No new matter has been introduced by this amendment. Claims 4 and 8 have been canceled without prejudice or disclaimer of subject matter. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which the Applicant is entitled.

The Title and Specification have been amended, thereby obviating the objections to the disclosure.

Claims 4 and 8 have been canceled, thereby rendering the Claim Objections and 35 U.S.C. §112, rejections moot.

II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1-3 and 5-7 were rejected under 35 U.S.C. 103(a) as allegedly unpatentable over U.S. Patent No. 6,757,694 to Goodman et al. (hereinafter, merely "Goodman") in view of U.S. Publication No. 2002/0161852 to Allen et al. (hereinafter, merely "Allen").

Claims 4 and 8 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Goodman, in view of Allen and in further view of U.S. Patent No. 6,880,101 to Golasky et al. (hereinafter, merely “Golasky”).

III. RESPONSE TO REJECTIONS

Claim 1 recites, *inter alia*:

“A tape library apparatus to which a node ID is assigned and that is connected to a host computer, comprising:

a plurality of drives for recording and reproducing data to and from respective large capacity tape recording mediums, the drives having respective interfaces being capable of transferring large capacity data to the host computer,

wherein the drives are assigned respective node IDs as first addresses and respective port IDs that represent mounted order numbers as second addresses and the interfaces are activated, and

wherein an address previously assigned to the drive upon production is used when each of the drives are not assigned the first address and the second address and a command causing the drive to be assigned the first address and the second address is not received from the host computer.” (emphasis added)

As understood by Applicant, Goodman relates to network devices in a storage system implementing unique names for enabling communication with the devices via uniquely identifying and assigning names to devices connected in networks. Assignment of names to existing library storage products provisioned requires allocation of unique names according to the serial numbers of each existing automated library storage product.

As understood by Applicant, Allen relates to a method and system for using a Fibre Channel for tracking remote devices with unknown configurations used by Fibre Channel

connected devices. Communication with a remote device takes place if the identified device identifier matches the previously stored device identifier.

As understood by Applicant, Golasky relates to a system and method for providing automatic data restoration after a storage device failure. An agent module detects a failure then locates backup data from the failed logical unit that is stored on a backup storage device and transfers the backup data from the backup storage device to a spare logical unit located on the primary storage device. The agent then maps the spare logical unit to an address associated with a host in response to detecting the failure at the logical unit.

Applicant submits that Goodman, Allen and Golasky, taken alone or in combination, fail to render claim 1 unpatentable. Applicant submits that although Goodman and Allen describe the node IDs and port IDs for identifying the drives in a library, Golasky only describes the method of re-storing the data from the failure drive to spare drive. Further, Golasky does not suggest the drive replacement without shutting down or re-booting of the library system.

Indeed, Applicant submits the present invention provides a tape library system having a plurality of tape drives capable of replacing the drive without the necessity of shutting down or re-booting the library system.

Furthermore, Applicant respectfully submits that Goodman, Allen and Golasky, taken alone or in combination, fail to teach or suggest the features of claim 1. Specifically, Applicant submits that there is no teaching or suggestion of tape library apparatus to which a node ID is assigned and that is connected to a host computer wherein an address previously assigned to the drive upon production is used when each of the drives are not assigned the first

address and the second address and a command causing the drive to be assigned the first address and the second address is not received from the host computer, as recited in claim 1.

None of the other references cited by the Examiner teach or suggest the subject matter recited in claim 1.

Therefore, Applicant respectfully submits that claim 1 is patentable.

For reasons similar to those described above with regard to independent claim 1, claim 5 is also believed to be patentable.

Therefore, Applicant submits that independent claims 1 and 5 are patentable.

IV. DEPENDENT CLAIMS

The other claims are dependent from independent claim 1, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

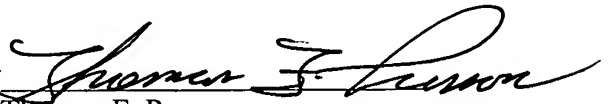
In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicant respectfully request early passage to issue of the present application.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP
Attorneys for Applicant

By 
Thomas F. Presson
Reg. No. 41,442
(212) 588-0800